

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JERRY D. GOODWIN, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ANADARKO PETROLEUM
CORPORATION, JAMES T. HACKETT,
ROBERT G. GWIN, and M. CATHY
DOUGLAS

Defendants.

Civil Action No. 1:10 CIV 4905 (PGG)

ECF Case

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**NOTICE OF MOTION OF THE PENSION TRUST FUND FOR OPERATING
ENGINEERS AND EMPLOYEES' RETIREMENT SYSTEM OF THE GOVERNMENT
OF THE VIRGIN ISLANDS FOR (1) APPOINTMENT AS LEAD PLAINTIFF; (2)
APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL; AND (3)
CONSOLIDATION OF ALL RELATED CASES**

SHIRLEY HARRIS, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ANADARKO PETROLEUM
CORPORATION, JAMES T. HACKETT,
ROBERT G. GWIN, and M. CATHY
DOUGLAS,

Defendants.

Civil Action No. 1:10 CIV 5894 (UA)

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Paul G. Gardephe, at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, Courtroom 6B, New York, New York, the Pension Trust Fund for Operating Engineers (“Operating Engineers”) and the Employees’ Retirement System of the Government of the Virgin Islands (“Virgin Islands”) will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order appointing Operating Engineers and Virgin Islands as Lead Plaintiff in the above-captioned actions, approving their selection of the law firm of Bernstein Litowitz Berger & Grossmann LLP as Lead Counsel for the Class, and consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure. Operating Engineers and Virgin Islands intend to demonstrate that they satisfy the relevant requirements of the PSLRA and, thus, should be appointed Lead Plaintiff.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith, the pleadings and other files herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Operating Engineers and Virgin Islands respectfully request that the Court: (1) appoint Operating Engineers and Virgin Islands as Lead Plaintiff pursuant to the PSLRA; (2) approve Lead Plaintiff’s selection of Lead Counsel for the Class; (3) consolidate all related actions; and (4) grant such other and further relief as the Court may deem just and proper.

DATED: August 23, 2010
New York, New York

Respectfully submitted,

By: _____/s/ Gerald H. Silk

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*Counsel for Operating Engineers, Virgin Islands,
and Proposed Lead Counsel for the Class*